

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, STATE OF)	
LOUISIANA)	
)	
Plaintiffs,)	
v.)	No. 6:21-cv-00016
)	
UNITED STATES OF AMERICA, <i>et al.</i>)	
)	
Defendants.)	
)	

PLAINTIFFS' EXHIBIT LIST

Plaintiffs designate the following exhibits for trial:

Ex.	Document Title
A	January 20, 2021 Memorandum
B	February 18, 2021 Memorandum
C	Declaration of Jason Clark (Texas Department of Criminal Justice)
C1	Exhibit 1 to Plaintiffs' Trial Exhibit C - <i>Profiles for Inmates with ICE Detainers Dropped -January 20 2021 - December 29 2021</i>
C2	Exhibit 2 to Plaintiffs' Trial Exhibit C - <i>Profiles for Inmates with ICE Detainers Dropped -January 20 2020 - December 29 2020</i>
D	Declaration of Thomas Homan
D1	Exhibit 1 to Plaintiffs' Trial Exhibit D - <i>Curriculum Vitae of Thomas Homan</i>
D2	Exhibit 2 to Plaintiffs' Trial Exhibit D - <i>U.S. Immigration and Customs Enforcement Fiscal Year 2020 Enforcement and Removal Operations Report</i>
D3	Exhibit 3 to Plaintiffs' Trial Exhibit D - <i>Review of and Interim Revision to Civil Immigration Enforcement and Removal Policies and Priorities</i>
D4	Exhibit 4 to Plaintiffs' Trial Exhibit D - <i>Interim Guidance: Civil Immigration Enforcement and Removal Priorities</i>

D5	Exhibit 5 to Plaintiffs' Trial Exhibit D - <i>Guidelines for the Enforcement of Civil Immigration Law</i>
D6	Exhibit 6 to Plaintiffs' Trial Exhibit D - <i>ERO FY 2019 Achievement</i>
E	Declaration of Bill E. Waybourn (Tarrant County Sheriff)
F	Declaration of Rebecca Waltz (Texas Department of Criminal Justice)
G	Declaration of Susan Bricker (Texas Health and Human Services Commission)
G1	Exhibit 1 to Plaintiffs' Trial Exhibit G - <i>Curriculum Vitae of Susan Bricker</i>
G2	Exhibit 2 to Plaintiffs' Trial Exhibit G – <i>Appendix B</i>
H	Declaration of Leonardo R. Lopez (Texas Education Agency)
H1	Exhibit 1 to Plaintiffs' Trial Exhibit H - <i>Unaccompanied Children Released to Sponsors by State</i>
I	Declaration of Sean Grove (Texas Juvenile Justice Department)
J	Texas Agreement
K	Louisiana Agreement
L	Declaration of Jonathan R. Vining (Louisiana Department of Public Safety and Corrections)
M	Letter from DHS to Texas
N	ICE FY2020 Enforcement and Removal Operations Report
O	ICE FY2019 Enforcement and Removal Operations Report
P	News Release; ICE Announces Case Review Process
Q	ICE Detention Data, FY2021 YTD
R	ICE Detention Data, FY2020
S	ICE Annual Report FY2020
T	DOJ 2018 Update on Prisoner Recidivism
U	Census Bureau Table: Geographic Mobility by Citizenship Status

V	The Foreign-Born Population in Texas: Sources of Growth
W	Gone to Texas
X	September 30, 2021 Memorandum
Y	Guidelines for the Enforcement of Civil Immigration Law
Z	AART Broadcast Email – November, 2021
AA	AART Quick Reference Guide – November, 2021
BB	AART Broadcast Email – December, 2021
CC	AART Quick Reference Guide – December, 2021

Date: January 11, 2022

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

PATRICK K. SWEETEN
Deputy Attorney General for Special Litigation
Attorney-in-Charge
Texas Bar No. 00798537
Southern District of Texas Bar No. 1829509
patrick.sweeten@oag.texas.gov

BRENT WEBSTER
First Assistant Attorney General

WILLIAM T. THOMPSON
Deputy Chief, Special Litigation Unit
Texas Bar No. 24088531
Southern District of Texas Bar No. 3053077
will.thompson@oag.texas.gov

JUDD E. STONE II
Solicitor General

/s/ Ryan D. Walters
RYAN D. WALTERS
Special Counsel
Texas Bar No. 24105085
Southern District of Texas Bar No. 3369185
ryan.walters@oag.texas.gov

OFFICE OF THE ATTORNEY GENERAL
P.O. Box 12548 (MC-009)
Austin, Texas 78711-2548
Tel.: (512) 463-2100
Fax: (512) 457-4410
COUNSEL FOR PLAINTIFF STATE OF TEXAS

JEFF LANDRY
LOUISIANA ATTORNEY GENERAL

/s/ Elizabeth B. Murrill
ELIZABETH B. MURRILL
Solicitor General
JOSEPH S. ST. JOHN
Deputy Solicitor General

Louisiana Department of Justice
1885 N. Third St.
Baton Rouge, LA 70804
(225) 326-6766
murrille@ag.louisiana.gov
stjohnj@ag.louisiana.gov

COUNSEL FOR PLAINTIFF STATE OF LOUISIANA

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on January 11, 2022, which automatically serves all counsel of record who are registered to receive notices in this case.

/s/ Ryan D. Walters
RYAN D. WALTERS